

EXHIBIT 2

Melanie Hesano

From: Laura Amtsbuechler
Sent: Tuesday, November 10, 2020 12:59 PM
To: Steve Drew
Cc: Melanie Hesano; Julie Doll; Kathryn Boyd; Andrea M. Pike
Subject: Heethuis

Steve,

We are preparing to file a Motion to Compel your client's Facebook messages. Before doing so, I thought it best to try one more time to see if we can narrow the issues.

First, I will say that we believe the messages are relevant to your client's psychological/emotional state and alleged non-economic damages, her mental state and the decision to send her for a fitness for duty exam in late 2017, your client's retirement plans, her efforts to mitigate, and any discussion of events at Sheriff's Department. As you know, it is our position that your client's credibility is at issue and these message also relate to the truthfulness of her claims.

I ask that you stipulate to an order which requires that your client produce her Facebook content including messages and posting as follows:

2014 to present-anything related to Sheriff's Office and or events at work there.

2017 to present-anything related to your clients mental state, emotional distress, or psychological treatment.

2018 to present – anything related to retirement plans and search for other work.

2014 to present- all messages to or from co-workers at Sheriff's Office or other County employees.

We have provided instructions for downloading this content form Facebook. It is relatively easy. This request it proportionate and designed to obtain only relevant information.

We have agreed that the Facebook content will be under the Protective Order.

If we do not hear back from you, we will file the Motion this coming Monday.

Thanks,
Laura



Laura S. Amtsbuechler

27555 Executive Drive, Suite 250

Farmington Hills, MI 48331

P 248.489.4100 | F 248.489.1726

Email: lamtsbuechler@rsjalaw.com

Website: rsjalaw.com

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